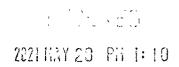


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SOAH DOCKET NO. 473-21-0538 PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

MOTION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR ADMISSION OF ADDITIONAL EVIDENCE PURSUANT TO TEXAS RULE OF EVIDENCE 107

Southwestern Electric Power Company (SWEPCO or the Company) moves for the admission of additional evidence in this proceeding pursuant to Texas Rule of Evidence 107 – Rule of Optional Completeness. In support, SWEPCO shows as follows:

At the Hearing on the Merits, the Administrative Law Judges (ALJs) ruled that parties could offer evidence, by Friday, May 28, 2021 for inclusion in the record under the doctrine of optional completeness. Accordingly, this motion is timely filed.

SWEPCO's optional completeness request goes to Commission Staff (Staff) Exhibit No. 67. Staff Exhibit No. 67 provides excerpts from the Company's response to Staff's Sixth Request for Information (RFI). Specifically, Staff Ex. No. 67 provides SWEPCO's response to Staff RFI 6-8, which requests workpapers showing the calculation, derivation, or source of the monthly amounts to annualize the "Debt issue-disc-loss." Staff Ex. No. 67 provides the response to Staff RFI 6-8, but does not include the referenced attachment. Because Attachment 1 contains the monthly detail requested by the RFI, it should be included in the record under Tex. R. Evid. 107. Without the attachment, the response is incomplete. Because SWEPCO does not know how Staff may reference the response to Staff RFI 6-8, it is necessary to have the complete response in the record to fully address any issue(s) that may arise. Therefore, SWEPCO offers its entire response to Staff RFI 6-8 as SWEPCO Exhibit No. 88.

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A copy of SWEPCO Exhibit No. 88 is attached to this motion for the ALJs review. Upon admission, SWEPCO will provide the requisite copies to the court reporter and the ALJs for the appellate record and upload the exhibit to the iManage system established in this docket.

SWEPCO respectfully requests the ALJs grant its motion for admission of SWEPCO Exhibit No. 88 as optional completeness to Staff Exhibit No. 67 pursuant to Tex. R. Evid. 107. SWEPCO requests such other and further relief to which it may show itself justly entitled.

Respectfully submitted,

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ATTORNEYS FOR SOUTHWESTERN ELECTRIC POWER COMPANY

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on May 28, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

Patrick Pearsall

SOAH DOCKET NO. 473-21-0538 PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE ELECTRIC POWER COMPANY FOR § OF AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

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Patrick Pearsall